

Exhibit B

From: Werlwas, Mary Lynne
To: Joyce, Kimberly (Law); Powell, Jeffrey K. (USANYS) 4; Debbie Greenberger
Cc: Jonathan S. Abady; Simpson, Kayla; Billingsley, David; Nairuby Beckles; Nunez-NYC; Steve Martin; Guillaume, Melissa; Sana Mayat; Anna Friedberg; Hendy, Cherae; Wolecki, Hilary; Baranchuk, Victoriya; Shechtman, Paul (DOC); Iodice, Ashley (Law); Neufeld, Sheryl (Law); Mooklal, Stefan (LAW); Eshkenazi, Lara (USANYS); Maginley-Liddie, Lynelle
Subject: Re: [EXTERNAL] Post-10/28 Meet and Confer
Date: Wednesday, October 26, 2022 8:04:43 AM

Please do circulate a link. Thank you.

Mary Lynne

Mary Lynne Werlwas

Director
Prisoners' Rights Project
Tel: [REDACTED]
she/her

From: Joyce, Kimberly (Law) [REDACTED]
Sent: Wednesday, October 26, 2022 8:00 AM
To: Powell, Jeffrey K. (USANYS) 4 [REDACTED]; Debbie Greenberger [REDACTED]; Werlwas, Mary Lynne [REDACTED]
Cc: Jonathan S. Abady [REDACTED]; Simpson, Kayla [REDACTED]; Billingsley, David [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-NYC [REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa [REDACTED]; Sana Mayat [REDACTED]; Anna Friedberg [REDACTED]; Hendy, Cherae [REDACTED]; Wolecki, Hilary [REDACTED]; Baranchuk, Victoriya [REDACTED]; Shechtman, Paul (DOC) [REDACTED]; Iodice, Ashley (Law) [REDACTED]; Neufeld, Sheryl (Law) [REDACTED]; Mooklal, Stefan (LAW) [REDACTED]; Eshkenazi, Lara (USANYS) [REDACTED]; Maginley-Liddie, Lynelle [REDACTED]
Subject: Re: [EXTERNAL] Post-10/28 Meet and Confer

Law and DOC can do 11/3 at 3:30, when SDNY is available. Should I circulate another video link?

Get [Outlook for iOS](#)

From: Powell, Jeffrey K. (USANYS) 4 [REDACTED]
Sent: Tuesday, October 25, 2022 5:24:18 PM
To: Joyce, Kimberly (Law) [REDACTED]; Debbie Greenberger [REDACTED]; Werlwas, Mary Lynne [REDACTED]
Cc: Jonathan S. Abady [REDACTED]; Simpson, Kayla [REDACTED]; Billingsley, David [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-NYC [REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa [REDACTED]

[REDACTED]; Sana Mayat [REDACTED]; Anna Friedberg
[REDACTED]; Hendy, Cherae [REDACTED]; Wolecki, Hilary
[REDACTED]; Baranchuk, Victoriya [REDACTED];
Shechtman, Paul (DOC) [REDACTED]; Iodice, Ashley (Law)
[REDACTED]; Neufeld, Sheryl (Law) [REDACTED]; Mooklal, Stefan (LAW)
[REDACTED]; Eshkenazi, Lara (USANYS) [REDACTED]; Maginley-Liddie,
Lynelle [REDACTED]
Subject: RE: [EXTERNAL] Post-10/28 Meet and Confer

The SDNY could do 11/3 at 3:30 pm or later or 11/9 in the morning.

Jeffrey K. Powell
Co-Chief
Civil Frauds Unit
Southern District of New York

A horizontal bar chart showing the percentage of respondents who have heard of various terms. The y-axis lists the terms, and the x-axis shows the percentage from 0% to 100% in 10% increments. The bars are black on a white background.

Term	Percentage
BlackBerry	98
Facebook	97
Twitter	95
YouTube	94
LinkedIn	93
Skype	92
Spotify	91
Instagram	89
Dropbox	88
Tumblr	87
Twitter (repeated)	86
Facebook (repeated)	85
Facebook (repeated 2)	84
Facebook (repeated 3)	83
Facebook (repeated 4)	82
Facebook (repeated 5)	81
Facebook (repeated 6)	80
Facebook (repeated 7)	79
Facebook (repeated 8)	78
Facebook (repeated 9)	77
Facebook (repeated 10)	76
Facebook (repeated 11)	75
Facebook (repeated 12)	74
Facebook (repeated 13)	73
Facebook (repeated 14)	72
Facebook (repeated 15)	71
Facebook (repeated 16)	70
Facebook (repeated 17)	69
Facebook (repeated 18)	68
Facebook (repeated 19)	67
Facebook (repeated 20)	66
Facebook (repeated 21)	65
Facebook (repeated 22)	64
Facebook (repeated 23)	63
Facebook (repeated 24)	62
Facebook (repeated 25)	61
Facebook (repeated 26)	60
Facebook (repeated 27)	59
Facebook (repeated 28)	58
Facebook (repeated 29)	57
Facebook (repeated 30)	56
Facebook (repeated 31)	55
Facebook (repeated 32)	54
Facebook (repeated 33)	53
Facebook (repeated 34)	52
Facebook (repeated 35)	51
Facebook (repeated 36)	50
Facebook (repeated 37)	49
Facebook (repeated 38)	48
Facebook (repeated 39)	47
Facebook (repeated 40)	46
Facebook (repeated 41)	45
Facebook (repeated 42)	44
Facebook (repeated 43)	43
Facebook (repeated 44)	42
Facebook (repeated 45)	41
Facebook (repeated 46)	40
Facebook (repeated 47)	39
Facebook (repeated 48)	38
Facebook (repeated 49)	37
Facebook (repeated 50)	36
Facebook (repeated 51)	35
Facebook (repeated 52)	34
Facebook (repeated 53)	33
Facebook (repeated 54)	32
Facebook (repeated 55)	31
Facebook (repeated 56)	30
Facebook (repeated 57)	29
Facebook (repeated 58)	28
Facebook (repeated 59)	27
Facebook (repeated 60)	26
Facebook (repeated 61)	25
Facebook (repeated 62)	24
Facebook (repeated 63)	23
Facebook (repeated 64)	22
Facebook (repeated 65)	21
Facebook (repeated 66)	20
Facebook (repeated 67)	19
Facebook (repeated 68)	18
Facebook (repeated 69)	17
Facebook (repeated 70)	16
Facebook (repeated 71)	15
Facebook (repeated 72)	14
Facebook (repeated 73)	13
Facebook (repeated 74)	12
Facebook (repeated 75)	11
Facebook (repeated 76)	10
Facebook (repeated 77)	9
Facebook (repeated 78)	8
Facebook (repeated 79)	7
Facebook (repeated 80)	6
Facebook (repeated 81)	5
Facebook (repeated 82)	4
Facebook (repeated 83)	3
Facebook (repeated 84)	2
Facebook (repeated 85)	1
Facebook (repeated 86)	0

10

Year	Number of publications
1990	10
1991	12
1992	15
1993	18
1994	22
1995	25
1996	28
1997	32
1998	35
1999	38
2000	40

11. **What is the primary purpose of the *Journal of Clinical Endocrinology and Metabolism*?**

Term	Percentage
GMOs	~10%
Organic	~75%
Natural	~70%
Artificial	~15%
Organic	~75%
Natural	~70%
Artificial	~15%
Organic	~75%
Natural	~70%
Artificial	~15%

From: Debbie Greenberge [REDACTED]
Sent: Sunday, October 23, 2022 10:18:59 PM
To: Werlwas, Mary Lynne [REDACTED]; Joyce, Kimberly (Law) [REDACTED]
Cc: Jonathan S. Abady [REDACTED]; Simpson, Kayla [REDACTED]
Billingsley, David [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-
NYC [REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa
[REDACTED]; Sana Mayat [REDACTED]; Anna Friedberg
[REDACTED]; Hendy, Cherae [REDACTED]; Wolecki, Hilary
[REDACTED]; Baranchuk, Victoriya [REDACTED];
Shechtman, Paul (DOC) [REDACTED]; Iodice, Ashley (Law)
[REDACTED]; Neufeld, Sheryl (Law) [REDACTED]; Mooklal, Stefan (LAW)
[REDACTED]; Jeff Powell [REDACTED]; Lara [REDACTED];
Eshkenazi [REDACTED]; Maginley-Liddie, Lynelle
[REDACTED]; Sana Mayat [REDACTED]
Subject: [EXTERNAL] Post-10/28 Meet and Confer

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Forward suspect email to [REDACTED] as an attachment (Click the More button, then forward as attachment).

Hope everyone had a nice weekend and adding Sana who has newly joined the case from ECBAWM. As Mary Lynne indicated below, we wanted to provide you with dates of availability for meeting and conferring after October 28 on other disputes that may arise in connection with that report. Plaintiffs can confer on 11/ 3 after noon or 11/4 after noon. Please let us know what works for the City and DOJ.

Debbie Greenberger

she/her

Partner

Emery Celli Brinckerhoff Abady Ward & Maazel LLP

600 Fifth Ave at Rockefeller Plaza, 10th Floor

New York, NY 10020

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: Werlwash, Mary Lynne [REDACTED]

Sent: Thursday, October 20, 2022 12:07 PM

To: Joyce, Kimberly (Law) [REDACTED]

Cc: Jonathan S. Abady [REDACTED] Simpson, Kayla [REDACTED]; Billingsley, David [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-
NYC [REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa [REDACTED]; Sana Mayat [REDACTED]; Debbie Greenberger [REDACTED]; Anna Friedberg [REDACTED]; Hendy, Cherae [REDACTED]; Wolecki, Hilary [REDACTED]; Baranchuk, Victoriya [REDACTED]; Shechtman, Paul (DOC) [REDACTED]; Iodice, Ashley (Law) [REDACTED]; Neufeld, Sheryl (Law) [REDACTED]; Mooklal, Stefan (LAW) [REDACTED]; 'Jeff Powell' [REDACTED]; 'Lara Eshkenazi' [REDACTED]; Maginley-Liddie, Lynelle [REDACTED]

Subject: [EXTERNAL] Follow-up to meet and confer on intake, death data

This Message originated outside your organization.

Kim,

We write to follow up to the meet and confer held this morning on the non-compliance and document request issues raised in our August 11 and August 26, 2022 notices.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

As noted at the meeting, we will write separately to provide you with dates of availability for meeting and conferring after October 28 on other disputes that may arise in connection with that report.

Mary Lynne

Mary Lynne Werlw

Director
Prisoners' Rights Project
Tel: [REDACTED]
she/her

From: Joyce, Kimberly (Law) [REDACTED]
Sent: Thursday, October 13, 2022 10:56 AM
To: Debbie Greenberger [REDACTED] Anna Friedberg [REDACTED]

Cc: Werlw, Mary Lynne [REDACTED]; Jonathan S. Abady [REDACTED]
Simpson, Kayla [REDACTED]; Billingsley, David [REDACTED] Levin (e),
Madison [REDACTED]; Nairuby Beckles [REDACTED] Nunez-NYC [REDACTED]
[REDACTED]; Steve Martin [REDACTED] Guillaume, Melissa [REDACTED]
[REDACTED]; Hendy, Cherae [REDACTED] Wolecki, Hilary [REDACTED]
[REDACTED]; Baranchuk, Victoriya [REDACTED];
Shechtman, Paul (DOC) [REDACTED]; Iodice, Ashley (Law) [REDACTED]
[REDACTED]; Neufeld, Sheryl (Law) [REDACTED]; Mooklal, Stefan (LAW) [REDACTED]
[REDACTED]; 'Jeff Powell [REDACTED] 'Lara [REDACTED]
Eshkenazi [REDACTED] Maginley-Liddie, Lynelle [REDACTED]

Subject: RE: [EXTERNAL] RE: Nunez Plaintiffs' Letter re In-custody Deaths

Thanks, Debbie. Confirmed for 10/20 from 9-10. I'll send a video link to this group by tomorrow.

Kim

From: Debbie Greenberger [REDACTED]
Sent: Thursday, October 13, 2022 9:50 AM
To: Joyce, Kimberly (Law) [REDACTED]; Anna Friedberg [REDACTED]
Cc: Werlw, Mary Lynne [REDACTED]; Jonathan S. Abady [REDACTED]
Simpson, Kayla [REDACTED]; Billingsley, David [REDACTED]; Levin (e),
Madison [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-NYC [REDACTED]
[REDACTED]; Steve Martin [REDACTED] Guillaume, Melissa [REDACTED]
[REDACTED]; Baranchuk, Victoriya [REDACTED]
Shechtman, Paul (DOC) [REDACTED]; Iodice, Ashley (Law) [REDACTED]

Subject: RE: [EXTERNAL] RE: Nunez Plaintiffs' Letter re In-custody Deaths

Kim,

Plaintiffs and DOJ can do 10/20 from 9-10. Please let me know if you will be circulating the zoom or I should.

Best

Debbie

Debbie Greenberger
she/her
Partner
Emery Celli Brinckerhoff Abady Ward & Maazel LLP
600 Fifth Ave at Rockefeller Plaza, 10th Floor
New York, NY 10020

10 of 10

1

113. **What is the primary purpose of the *Journal of Clinical Endocrinology and Metabolism*?**

Term	Percentage
GMOs	~10%
Organic	~75%
Natural	~70%
Artificial	~15%
Organic	~75%
Natural	~70%
Artificial	~15%
Organic	~75%
Natural	~70%
Artificial	~15%
Organic	~75%
Natural	~70%
Artificial	~15%

From: Joyce, Kimberly (Law) [REDACTED]
Sent: Friday, September 23, 2022 5:21 PM
To: Anna Friedberg [REDACTED]; Debbie Greenberger

[REDACTED]
Cc: Werlwas, Mary Lynne [REDACTED]; Jonathan S. Abady [REDACTED]; Simpson, Kayla [REDACTED]; Billingsley, David [REDACTED]; Levin (e), Madison [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-NYC [REDACTED]; [REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa [REDACTED]; [REDACTED]; Hendy, Cherae [REDACTED]; Wolecki, Hilary [REDACTED]; [REDACTED]; Baranchuk, Victoriya [REDACTED]; Shechtman, Paul (DOC) [REDACTED]; Iodice, Ashley (Law) [REDACTED]; [REDACTED]; Neufeld, Sheryl (Law) [REDACTED]; Mooklal, Stefan (LAW) [REDACTED]; [REDACTED]; 'Jeff Powell [REDACTED]')' [REDACTED]; 'Lara Eshkenazi ([REDACTED])' [REDACTED]; Maginley-Liddie, Lynelle [REDACTED]

Subject: Re: [EXTERNAL] RE: Nunez Plaintiffs' Letter re In-custody Deaths

This Message originated outside your organization.

Counsel,

Please find attached the City's response to your letters dated August 16th and September 16th. We look forward to hearing from you.

Thank you,

Kim

Get [Outlook for iOS](#)

From: Anna Friedberg [REDACTED]
Sent: Friday, September 23, 2022 4:48 PM
To: Debbie Greenberger <[REDACTED]>
Cc: Werlwas, Mary Lynne [REDACTED]; Jonathan S. Abady [REDACTED]; Simpson, Kayla [REDACTED]; Billingsley, David [REDACTED]; Levin (e), Madison [REDACTED]; Nairuby Beckles [REDACTED]; Nunez-NYC [REDACTED]; [REDACTED]; Steve Martin [REDACTED]; Guillaume, Melissa [REDACTED]; [REDACTED]; Hendy, Cherae [REDACTED]; Wolecki, Hilary [REDACTED]; [REDACTED]; Baranchuk, Victoriya [REDACTED]; Shechtman, Paul (DOC) [REDACTED]; Iodice, Ashley (Law) [REDACTED]; [REDACTED]; Neufeld, Sheryl (Law) [REDACTED]; Mooklal, Stefan (LAW) [REDACTED]; [REDACTED]; 'Jeff Powell [REDACTED]')' [REDACTED]; 'Lara Eshkenazi [REDACTED]' [REDACTED]; Maginley-Liddie, Lynelle [REDACTED]; [REDACTED]; Joyce, Kimberly (Law) [REDACTED]

Subject: [EXTERNAL] RE: Nunez Plaintiffs' Letter re In-custody Deaths

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. Forward suspect email to [REDACTED] as an attachment (Click the More button, then forward as attachment).